

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DAWN MICHELE MEAD : CHAPTER 13  
Debtor :  
 :  
JACK N. ZAHAROPOULOS :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
 :  
vs. :  
 :  
DAWN MICHELE MEAD :  
Respondent : CASE NO. 5-23-bk-01181

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 26th day of June, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor's plan for the following reason(s):

1. Debtor's plan violates 11 U.S.C. §§ 1322(a)(1) and 1325(b) in that the debtor has not submitted all or such portion of the disposable income to the Trustee as required. More specifically,

Trustee alleges and avers that debtor's disposable income is greater than that which is committed to the plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. Transportation ownership expense – Line 13 – Ownership expense for vehicles(s) without lien not permitted.
- b. The debtor claims a household size of three, which includes himself, a 24-year-old son and a 20-year-old son. No contribution from either adult child is listed.

WHEREFORE, Trustee alleges and avers that debtor's plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 29<sup>th</sup> day of June, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

John Fisher, Esquire  
126 South Main Street  
Pittston, PA 18640

/s/Deborah A. DePalma  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee